

**Sent:** Thursday, June 22, 2006 2:22 PM

**Subject:** Comments on the Gerlach Green Energy, LLC EA

6-22-06

Dear Ms. Cates and members of the EA team:

Thank you for allowing me to extend your deadline by one week on the Gerlach Green Energy, LLC EA# NV-020-06-EA-12

Overall, I want to compliment the team for a pretty clear document, but I do have some comments and questions:

1. There are statements implying that the site will be reclaimed (vis-avis, revegetation mixes, etc.), but it is not clearly stated until pages 26 and 28 under "mitigation measures." Reclamation of the site ought to be discussed earlier in "Alternatives and Analysis."
2. Wildlife: Even though the EA states that there isn't much wildlife that will be affected and seems to dismiss it as a mitigation measure, will the reserve pits for fluids be fenced to prevent access to wildlife? You acknowledge that there may be some hazardous waste. I hope you will address the proximity of the Desert bighorn sheep that descend the Granite Range in the winter and graze very nearby along Doobie Road. Let me just say that I've observed kit foxes lapping at overturned sani-hut fluids following Burning Man. I would urge you to take similar precautions for both birds and wildlife that you take for other mining operations. Please be specific in the mitigation measures and possibly about the season for drilling.
3. This EA does not seem to mention potential long term impacts to visual and other resources should the project be successful. It only mentions short term impacts. Long term impacts should at least be mentioned in the analysis and a statement should be included as to what future potential actions might occur if the project is successful.
4. On page 9, you discuss aggregate and water requirements. You state that the drilling will use approximately 20,000gal/day, but you don't even estimate the amount of water for dust control, etc. Could you please estimate what additional water is needed for both drilling and dust control? And would you identify what neighboring wells will be used to supply that water? Are these domestic or commercial wells, and are they certificated to pump that much on a temporary basis? Domestic wells allow for 1800 gals/day only.
5. On page 12 you allude to a reasonable range of alternatives under NEPA. You have only two; the project and the No Action Alternative. The proposed action is obviously "the reasonable "action of choice?"
6. In Figure 4, the typical pad layout: If you've built up a pad, does that mean the reserve pit is above grade or below grade or bermed? Does it mean the pit will be lined to prevent leakage during the evaporative process? This is not clear in the EA. I would urge you to consider lining the reserve pit as a mitigation measure.
7. Under 3.7 on page 19 you talk about wastes, hazardous and solid. There is not mention of possible fuel spills during the drilling. I can only assume the project will be using diesel or gasoline to run the drill. Will you please address possible fuel spills or other chemical spills and require a plan of action should one occur?

8. Also on page 19, you address monitoring of Great Boiling Springs during the drilling. Is there any possibility the drilling may alter the flows are any of the surrounding hot springs? If so what are the procedures, if any, for losses, even temporary losses of hot springs flows?  
What would constitute "mitigation?"

9. Since this has some proximity to the National Historic Emigrant Trail mile-wide corridor, no mention was made of any potential impacts. In fact, it seems that the Trail was ignored in cultural and historical impacts. Could you please at least address this in the final EA, then discuss what mitigation might occur? This is critical to those of us who spent so much time planning for this area. You'll recall that the Planning group, on a split vote of 23-2 vote, didn't support geothermal drilling on the South Playa, and was reversed in Washington, D.C.

10. Visual resources are very important on the South Playa. I hope drilling will occur when it causes the least impact to visitors. But on second thought, maybe it should be visible to a maximum number of visitors.

Thank you again for allowing me to comment.

Susan Lynn  
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